

GEORGE COLLINS, ET AL. vs STATE FARM FIRE AND CASUALTY COMPANY
30(b)(6) Kevin Chester Dandridge on 10/30/2023

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF OKLAHOMA

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4
5 (1) GEORGE COLLINS and)
6 (2) ALRIKA COLLINS,)

7 Plaintiffs,)

8 v.)

No. 22:cv-00318-RAW-JAR

9 (1) STATE FARM FIRE AND)
10 CASUALTY COMPANY)

11 Defendant.)
12 _____)

13

14

15

16 DEPOSITION OF KEVIN CHESTER DANDRIDGE

17 30(b)(6) 1 LIFE SAFETY

18 Phoenix, Arizona

19 October 30, 2023

20 8:23 a.m.

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22

23

24 REPORTED BY:

Kate E. Roundy, RPR

25 Arizona Certified Reporter

Certificate No. 50582



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1 A. I have no problem doing that.

2 Q. How much have you been paid for your work in this
3 claim?

4 A. A thousand.

5 Q. Is that just a flat rate?

6 A. It's a flat rate.

7 Q. And I think you said this was a partial plan, or
8 something along those lines, earlier?

9 A. It's a review process. It's where I take their
10 documentation -- I mean, they, as the person that's hiring
11 me -- review what they have, look at their pictures, their
12 writings, and write up a report from their pictures or --
13 as well as Google Earth and their documentation that
14 they -- like I said, that they provide.

15 I do not walk the jobsite on a review. I don't
16 travel to the jobsite.

17 Q. And that's just a flat rate?

18 A. Correct.

19 Q. Is there -- in addition, if they wanted you to do
20 more in a particular case, do you have another level up
21 that you prepare a different report or a different type of
22 work?

23 A. The two main reports that I do are reviews and
24 protocols.

25 A protocol is a -- I walk the jobsite. I usually

1 meet with my client that's hiring me and look at the whole
2 scope of the work, what it's going to take.

3 For residential, it is usually just a review
4 process. They're smaller, actually easier. They're not
5 too in-depth.

6 Q. How much is a protocol?

7 A. 5,000 flat fee plus travel.

8 Q. And would you agree with me that if you actually
9 went to the jobsite, you would have a better understanding
10 of what the loss was or what repairs, protocols need to be
11 in place versus relying on someone providing you some
12 pictures?

13 A. Yes. I can get an actual visual on all aspects
14 of the job, power lines, sewers.

15 Q. Were you ever asked to do a protocol in this
16 case?

17 A. Not a protocol, no.

18 Q. You were simply asked to review the documents
19 that were given to you and prepare your safety plan; true?

20 A. Correct.

21 Q. And were you hired by Mr. Rupert?

22 A. I was hired by Mr. Rupert.

23 Q. Have you worked with Mr. Rupert before?

24 A. Not on this -- not before this job, no, I don't
25 think so.

1 the work's going to be done more than -- because I don't
2 want to be -- I don't want to be brought in or claimed
3 that I'm trying to alter or justify what they've said.

4 You know, if they say it needs a reroof, then I
5 write up safety for reroofing.

6 If they say they have asbestos in it -- now, if I
7 do get an asbestos documentation, you know, a report, I
8 read through it to see what the levels are, to see if it's
9 an acceptable level or not. I mean, mind you, there's not
10 really an acceptable level. There is more on lead than
11 there is asbestos, but to see how we want to attack it.
12 And I mean that in the fact of is it one room, is it the
13 whole building, is it -- how are the rooms tied together,
14 how hot are they so we can write up a program for that.

15 **Q. Is it fair to say that what you were provided**
16 **that's contained in your report was based on information**
17 **given to you by Mr. Rupert?**

18 A. Yes.

19 **Q. And Mr. Rupert only?**

20 A. Yes.

21 **Q. Do you know -- do you know how big this claim**
22 **file is?**

23 A. How big it is? Cost-wise, no, I don't.

24 **Q. No, that's a silly question.**

25 A. Okay.

1 off and replaced, an R&R, how to safely do that for that
2 building.

3 Say a building across the street would definitely
4 be scaffolding for a single-story residential. There may
5 be some scaffolding involved, depending on the height of
6 the wall.

7 Those things, in my mind's eye, if they come to
8 an agreement they're not going to replace the siding, both
9 parties do, and they can take that cost out.

10 Q. Yeah, you're are not making claims decisions?

11 A. Not at all.

12 Q. And people do have disputes all the time about
13 what's covered or what may not be covered true?

14 A. Correct.

15 Q. Your job is -- has nothing to do with that.

16 Your job is if this is done, this is what I
17 recommend be done to safely do the job?

18 A. Correct.

19 Q. And this might be the cost that I assign to that?

20 A. Correct.

21 Like on my cost sheets, I will put -- the way I
22 have it designed is weeks of work, how many weeks.

23 I have been in depositions where they're like,
24 well, the GC is saying you put 26 weeks. They're saying
25 they can do it in 24 weeks. I question -- I work

1 plan; correct?

2 A. I do.

3 Q. And would you agree with me, sir, that this is
4 more of a training manual or a checklist on safety
5 protocols versus an actual estimate?

6 A. It is. It's more of a review of what I saw and
7 what I was told the work was going to be done.

8 So this is what we are going to need to do that
9 work.

10 Q. And when you say what you saw, that was what
11 Mr. Rupert provided you; true?

12 A. Correct.

13 Q. Is this report, sir -- when I read this report,
14 it seems like this is kind of a template that you use over
15 and over; true?

16 A. There is a template to my report as well as
17 others. You know, many people use a base that they start
18 off with.

19 Q. I mean, there's a lot of things in here that are
20 listed for just basics, safety guidelines, things of that
21 nature?

22 A. There is.

23 Q. Has nothing to do with Collins particular loss,
24 but just an overall safety general guideline checklist
25 kind of thing --

1 Do you know if the Collins ever employed a
2 general contractor?

3 A. No.

4 Q. Okay. Page 47, please.

5 This is where we get into PP equipment?

6 A. Yes.

7 Q. We discussed the mask situation earlier?

8 A. We did.

9 Q. You also have on here rubber gloves,
10 approximately \$2300 for 25 weeks.

11 And I think your position was that was for debris
12 removal, the carcinogens from the fire?

13 A. Yeah. So --

14 Q. Is that the basis for that?

15 A. Yeah.

16 Q. Do you know -- do you think it would take
17 25 weeks to remove that debris?

18 A. Not just for removal of the debris. I mean, you
19 should wear rubber gloves when painting because -- keeping
20 your hands clean and keeping out from underneath your
21 nails and then eating it later.

22 Q. So there are more reasons for rubber gloves
23 besides the carcinogens?

24 A. Yeah.

25 Q. Painting is one?

1 A. Painting can be one, yes.

2 Q. Do you know of any painters that wear rubber
3 gloves when they paint?

4 A. I do.

5 Q. Do you believe that is...

6 A. Common practice?

7 Q. Common?

8 A. No.

9 Q. What other reasons would there be for use of
10 rubber gloves for 25 weeks?

11 A. Oh, I don't know off the top of my head.
12 Depending on the work that's being done.

13 Q. You have leather gloves on there, cut-proof
14 gloves?

15 A. Yeah.

16 Q. At \$9,000, approximately?

17 Well, that's exactly \$9,000?

18 A. It sure is, isn't it?

19 Q. That's 50 units at \$7.30 a pair, and that's for
20 25 weeks as well.

21 Are you in the opinion that these workers and
22 these laborers would need new leather gloves every week?

23 A. Let me take a look at something real quick.

24 Q. Sure.

25 A. Because see, here's the thing, I'm going tell you

1 A. Could be.

2 Q. And it's your opinion that these laborers would
3 need a new set of leather gloves every week; true?

4 A. Could be.

5 Q. Next page, we have face shields?

6 A. I'm going to pull this clip off so I can look at
7 it.

8 Q. Okay. You with me?

9 A. Yes.

10 Q. Page 48? Face shields with a cost of over
11 \$20,000. These are for 65 weeks.

12 Do you know why you have --

13 A. I think --

14 Q. -- 65 weeks?

15 A. -- to be honest with you, I think I have a
16 mistype in that.

17 Q. So that should be 25 weeks?

18 A. If it was going to follow along with the rest of
19 the job at 25 weeks, yes.

20 Q. Earplugs, 62.40?

21 A. I've got a 52-week there. I have a mistype at
22 52 weeks. It should be 25 weeks.

23 Q. And then you also have head protection.

24 I assume you're talking about hard hats; is that
25 correct?

1 A. I am.

2 Q. Sir, is it your opinion that gloves and goggles,
3 hard hats, work clothes, for that matter, aren't standard
4 equipment for contractors?

5 A. They are required equipment for contractors that
6 are disposable.

7 Q. And if they have these materials already, if
8 they're standard equipment, they already have a hard hat,
9 they already have goggles and gloves, this estimate would
10 not be appropriate for the Collins; true?

11 A. Not true.

12 Q. Why not?

13 A. Again, because it's all disposable.

14 If -- let's -- I know in the real world, a
15 foreman is a foreman. He has a hard hat. He has his
16 gloves. He has his vest. He stays with -- he's with the
17 company. He's a foreman for the company. He'll probably
18 be there quite a while.

19 The laborer, they float in and out. I can have a
20 completely different labor crew every week.

21 And if they're being hired on, they have to be
22 issued the equipment. I cannot take a hard hat from
23 worker 1 and give it to worker 2. It's against the law.

24 Q. Well, you don't know who the contractors are that
25 the Collins utilized; right?

1 A. I do not.

2 Q. So you don't know if those contractors provided
3 their laborers with those materials; true?

4 A. I do not.

5 Q. And if they did provide those laborers with those
6 materials and that was included in their cost, it wouldn't
7 be appropriate for them to seek additional payment for
8 those items; correct?

9 A. If -- if -- I'm sorry, can you restate that?

10 Q. I hope.

11 If the contractor provided these materials,
12 gloves, masks, hard hat to their employees and that was
13 included in their cost, then it wouldn't be accurate to
14 then charge more -- or appropriate to charge more for
15 these items if they already had them; correct?

16 A. It would not be accurate to charge for, say, a
17 hard hat if they already --

18 Q. It'd be inflated?

19 A. Excuse me?

20 Q. It would be inflated; right?

21 If they already had a hard hat and you're
22 charging for a hard hat, that's inflated?

23 A. That would be inflated.

24 Q. If they already had gloves, they already had
25 masks, that was included in their cost?

1 A. I have no clue.

2 Q. You also have on here signage and flagmen in over
3 \$30,000.

4 Do you see that?

5 A. Hold on.

6 \$30.

7 Q. 30,000 towards the bottom, that's just general
8 labor for a flagman?

9 A. Let's see. We've got \$30 an hour. One person,
10 40 hours.

11 Q. 25 weeks?

12 A. 25 weeks.

13 Q. And it's your opinion that the Collins need a
14 flagman outside their residence all day, every day for
15 25 weeks at a cost of \$30,000?

16 Is that true?

17 A. If there's moving equipment around -- normally on
18 a residential home, you have traffic driving around, you
19 know, cars coming in and around or kids, that kind of
20 stuff, so you would have somebody that would monitor on
21 that.

22 Now, I do -- because I Google Earthed the address
23 this morning, this is more of a country setting.

24 Q. Yeah, it's out in the middle of nowhere.

25 A. It's not in the middle of a neighborhood, so...

1 Q. So that should be --

2 A. I would say we should probably definitely adjust
3 that down.

4 Q. And that would have been helpful if Mr. Rupert
5 would have told you that information when you prepared
6 your report; true?

7 A. That is true.

8 Q. And that's why it would be more beneficial if you
9 actually went and looked at the project before you
10 prepared your report; true?

11 A. I would prefer to walk projects, yes.

12 MR. MCKEEVER: Object to form.

13 MR. BROWN: Sorry, Terry?

14 MR. MCKEEVER: I made an objection.

15 MR. BROWN: Okay.

16 MR. MCKEEVER: But he answered anyway, so go
17 ahead.

18 MR. BROWN: We got it. We got you down.

19 BY MR. BROWN:

20 Q. And just one other point that I have.

21 Even if this was in the middle of a neighborhood,
22 you don't have the opinion that they'd need a flagman
23 there for the full tenure of the repairs, six months;
24 right?

25 A. No. It to be honest with you, in reviewing -- in

1 you need to look at this.

2 They may look at this and say, I don't need a
3 telehandler for 25 weeks. I only need it for ten. I
4 don't need --

5 **Q. Or I don't need it at all?**

6 A. Or I don't need it at all. And they can take
7 that cost out.

8 Again, this is strictly a guideline. And I will
9 say since this report was built and sent over, on the
10 first page of the cost sheet, there's a big side note that
11 says this is strictly for -- I can't say the exact term.
12 I would have to read it. But this is an estimated, you
13 know, not a final cost.

14 **Q. Are you planning to travel down to Muskogee,**
15 **Oklahoma and testify in federal court as it relates to**
16 **this matter?**

17 A. I'm not planning on it unless you ask me to.

18 **Q. The pricing that you utilized when you mentioned**
19 **that you go through Home Depot and things like that?**

20 A. I do. Because most people end up shopping there.

21 **Q. Is the pricing that you have in your report that**
22 **we're talking about today, is that pricing from Oklahoma**
23 **Home Depots, or is that pricing from Arizona Depots, or do**
24 **you know?**

25 A. I don't know off the top of my head if I looked

1 A. No, I did not. I'm sorry, I thought you changed
2 the end of the question. I apologize.

3 Q. And this report that you prepared, this safety
4 plan you prepared was based on limited documentation you
5 received from Ian; correct?

6 A. Correct.

7 Q. Your report and opinion doesn't provide anyone
8 with information regarding the amount of damage sustained
9 at plaintiffs' residence in January of 2021, does it?

10 A. No.

11 Q. But your estimate's almost \$180,000 for repairs?

12 A. I think it was 160.

13 Q. Would you agree that your opinion's based on
14 limited information?

15 A. It is.

16 MR. MCKEEVER: Object to the form.

17 MR. BROWN: Other than you providing that
18 information we talked about earlier, I don't have any
19 further questions. I appreciate your time.

20 THE WITNESS: No. Thank you.

21 MR. BROWN: Terry, I'll pass the witness.

22 MR. MCKEEVER: Okay.

23 I just have one -- I think it's a follow-up a
24 little bit on what counsel was asking you about on the
25 price list, because I just wanted to have an understanding